

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

IN RE: JOSEPH-DELERME, GESSIE ) CHAPTER 13  
Debtor )  
CASE: NO. 09-17761-FJB

**MOTION OF DEBTOR TO APPROVE AMENDMENT TO PROPOSED PLAN**

Gessie Delerme, Debtor, pursuant to Federal Bankruptcy Rule 1009, in the above-captioned case hereby amends Plan to add a statement of cause which is required by 11 U.S.C. sec. 1322 (d)(2) and the MLBR, Appendix 1, 13 - 4 ( c ) Said statement was omitted by inadvertence (see attached).

As reflected in the attached amendment, the Debtor seeks to add a statement of cause for her proposed plan. This amendment is filed after conclusion of 341 meeting but prior to confirmation of the proposed Plan.

**CERTIFICATE OF SERVICE**

I, Terrence L. Parker, attorney for the debtor, hereby certifies that a copy of the foregoing Motion to Approve and amendment to the plan of the Debtor has been this day served upon the Chapter 13 Trustee, Carolyn Bankowski, via ECF, to the Debtor at her mailing address of record, and all creditors on the following service list in the case by first class mail, postage prepaid or by electronic notice.

Dated:

12/4/09



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Service list

Gessie Joseph-Delerme  
59 Thacher Street  
Milton, MA 02186

Carolina Collegiate Fe  
710 Pulaski St  
Columbia, SC 29201

Chase Credit Card  
P.O. Box 79152  
Phoenix, AZ 19850-5298

Crd Prt Asso  
13355 Noel Rd Ste 2100  
Dallas, TX 75240

CSNA  
P.O. Box 15021  
Wilimington, DE 19850

Emory L. Clark  
Clark & Washington, PC  
33000 North East Expressway  
Atlanta, GA 30341

Gulf Cst Col  
5690 Marquesas Cir  
Sarasota, FL 34233

Habor One Credit Union  
68 Legion Parkway  
Brockton, MA 02301

Harbor One Credit Union  
68 Legion Pkwy  
Brockton, MA 02301

Henry Medical Center  
1133 Eagles Landing Pkwy  
Stockbridge, GA 30281

Hsbc Bank  
Po Box 5253  
Carol Stream, IL 60197

Jean Delerme  
59 Thacher Street  
Milton, MA 02186

Joel S. Hershman  
John E. McCluskey, Esq.  
932 Main Street  
Brockton, MA 02301

Macys/Filenes  
P.O. Box 183083  
Columbus, OH 43218

Midland Cred  
8875 Aero Dr  
San Diego, CA 92123

National Grid-Ne  
6390 Main St S-160  
Williamville, NY 14221

Pcc  
3451 Harry S Truman Blvd  
Saint Charles, MO 63301

Rbs Citizens Na  
Po Box 6180  
Indianapolis, IN 46206

Rooms To Go  
C/O Tide Water Credit  
P.O. Box 13306  
Chesapeake, VA 23325

Sallie Mae  
1002 Arthur Dr  
Lynn Haven, FL 32444

Wilshire Credit Corp  
1776 Sw Madison St  
Portland, OR 97205

Tufts Dental  
1 Kneeland Street  
Boston, MA 02111

Target  
P.O. Box 9745  
Minneapolis, MN 55440

Scana Energy Marketing  
3340 Peachtree Rd Ne Ste  
Atlanta, GA 30326

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS

In re: JOSEPH-DELERME, Gessie

)

Chapter 13

Debtor,

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Case#: 09-17761-FJB

AMENDMENT TO PLAN

Statement of Cause for a 60 month plan

Debtor is attempting to save her home from foreclosure. A 60 month plan is necessary to cure the anticipated allowed arrearage of the mortgage on her residence.